

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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ROLANDO RODRIGUEZ,  
Petitioner,

v.

LOIS RUSSO,  
Respondent.

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Civil Action No. 05-11521-RCL

**RESPONDENT LOIS RUSSO'S MOTION FOR ENLARGEMENT OF TIME  
TO FILE A MEMORANDUM IN OPPOSITION TO THE  
PETITION FOR WRIT OF HABEAS CORPUS**

Respondent Lois Russo, through counsel, respectfully moves this Court to further enlarge the time in which to file her memorandum in opposition to the above-captioned petition for writ of habeas corpus to October 9, 2006. The respondent recently requested that this Court amend its March 9, 2006 scheduling order, making August 28, 2006 the date on which the respondent's memorandum in opposition to the petition for writ of habeas corpus is due.

Since the filing of the motion to amend, under-signed counsel has been served with a time sensitive motion to compel in the matter of *Waters v. Town of Ayer*, USDC No. 04-10521-GAO for which a response is due by August 31, 2006. Further, undersigned counsel is expecting a child on or about August 27, 2006 and will be taking a two-week leave of absence as a result. Due to the time constraints set forth above, undersigned counsel will require additional time to effectively oppose the petition for writ of habeas corpus.

Wherefore, respondent, Lois Russo respectfully requests that the Court enlarge the time for filing an opposition to the petition for writ of habeas corpus in the above-captioned matter to October 9, 2006.

Respectfully submitted,

THOMAS F. REILLY  
ATTORNEY GENERAL

/s/ Jonathan Ofilos  
Jonathan Ofilos  
Assistant Attorney General  
Criminal Bureau  
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BBO # 658091

Dated: August 22, 2006

**LOCAL RULE 7.1**

By order of the court, the moving party was not required to confer with other parties before filing this motion.

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served upon the petitioner, Rolando Rodriguez, on August 22, 2006, by depositing the copy in the office depository for collection and delivery by first-class mail, postage pre-paid, to him as follows: Rolando Rodriguez, *pro se*, W65630, Souza-Baranowski Correctional Center, P.O. Box 8000, Shirley, Massachusetts 01464.

/s/ Jonathan Ofilos  
Jonathan Ofilos  
Assistant Attorney General